

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
	)	Cr. No. 05-10003-NMG
v.	)	
	)	
ARTHUR GIANELLI, et al.,	)	
	)	
Defendants.	)	

GOVERNMENT'S RESPONSE TO DEFENDANTS' MOTION FOR EXTENSION OF TIME

On November 20, 2007, defendants Arthur Gianelli, Mary Ann Gianelli, Gisele Albertelli, Stephen Russo, Rafia Feghi, Randy Albertelli, Salvatore Ramasci, and Frank Iacoboni filed a motion for an extension of time from December 7, 2007 to February 29, 2008 for filing of any substantive motions in the above-captioned case.

When the Court established December 7, 2007 as the due date for defendants to file substantive motions, the government was given until January 17, 2008 to file its response. The government hereby requests that if these defendants are given an extension of time to file their substantive motions, the government should be given the same amount of time to respond as under the currently existing schedule. Therefore, the government requests that if the defendants' substantive motions are to be due on February 29, 2008, the government's response should be due by April 10, 2008.

In addition, if these defendants are given their requested extension of time, and if the government is given until April 10, 2008 to respond, it is hereby requested that the Court order a Speedy Trial Act exclusion through April 10, 2008, pursuant to 18 U.S.C. §§ 3161(h)(1)(F) and 3161(h)(1)(8).

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered parties.

/s/ Michael L. Tabak  
Michael L. Tabak  
Assistant United States Attorney

Date: November 21, 2007